

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

Gunvor SA,)	
)	
Plaintiff,)	
v.)	Civil Action No. 1:18-cv-00934-LMB-MSN
)	
Kayablian, et al.,)	
)	
Defendants.)	
_____)	

**DEFENDANTS' MOTION TO DISMISS
OR, IN THE ALTERNATIVE, TO COMPEL ARBITRATION**

Pursuant to 9 U.S.C. § 4 of the Federal Arbitration Act and Federal Rules of Civil Procedure 9(b), 12(b)(1), 12(b)(6), 12(b)(7), and 19, Defendants Arman Kayablian, Lawrence Kayablian, and Amira Group Company, LLC (collectively "Defendants"), through their undersigned counsel, move the Court to dismiss the Complaint of Plaintiff Gunvor SA or, in the alternative, to compel arbitration. A supporting memorandum and the Declaration of Lawrence Kayablian accompany this motion.

WHEREFORE Defendants move the Court to dismiss Plaintiff's Complaint in its entirety or, in the alternative, to compel arbitration.

Dated: September 14, 2018

Respectfully submitted,

By: /s/ John W. Lomas, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of September, 2018, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send notification of such filing (NEF) to the following counsel of record for Plaintiff Gunvor SA:

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